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REMARKS

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Claims 16-22 and 30-41, all the claims pending in the application, stand rejected on prior art grounds. Claims 30-41 stand rejected under 35 U.S.C. §101; and, the drawings are objected to. Applicants respectfully traverse these rejections based on the following discussion.

I.   **The Objections to the Drawings**

The drawings are objected to under 37 CFR 1.83(a). More specifically, the Office Action argues that "[t]here is no relation between the drawings and the claims" (Office Action, p. 2, item 2). Applicants respectfully disagree.

More specifically, FIGS. 1 and 2 of Applicants' disclosure illustrates an automated method for interpreting codified provisions, said method comprising: mapping codes 130 to logic rules 140, wherein said codes 130 comprise statements of conduct comprising at least one of laws, policy statements, contract provisions, agreements, regulations, rules of association, constitutions, codes of conduct; representing codes 130 as logic rules 140; associating triggering events 120 with said codes 130, wherein said triggering events 120 comprise violations of said statements of conduct; associating evaluation functions with said codes 130, wherein said evaluation functions comprise a user's interest 110 in said codes 130; inquiring whether an occurrence of an event 120 has a correct predetermined code of said codes 130 associated therewith based on provisions 160 provided in a document (rule evaluation 150); selecting said logic rules 140 to apply to said occurrence of said event 120; evaluating

said logic rules 140 when one of said triggering events 120 occur in order to select said correct predetermined code; wherein said evaluating of said logic rules 140 comprises identifying codes 130 matching said evaluation functions; identifying said correct predetermined code based on the evaluations of said logic rules 140, wherein said correct predetermined code matches said evaluation functions; and providing said user with calculated results comprising the identified correct predetermined code and said provisions 160 provided in said document corresponding to said correct predetermined code. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw these objections.

II.   The 35 U.S.C. §101 Rejection

Claims 30-41 stand rejected under 35 U.S.C. §101. More specifically, the Office Action argues that because claims 30-41 are directed towards software programs, the claims are not limited to patentable subject matter (Office Action, p. 4, item 6). Applicants respectfully disagree.

As described in section 2106 of the MPEP, "[a] claimed invention is directed to a practical application of a 35 U.S.C. 101 judicial exception when it: A) "transforms" an article or physical object to a different state or thing; or (B) otherwise produces a useful, concrete and tangible result". Section 2106 of the MPEP further states that:

> USPTO personnel first shall review the claim and determine if it provides a transformation or reduction of an article to a different state or thing. If USPTO personnel find such a transformation or reduction, USPTO personnel shall end the inquiry and find that the claim meets the statutory requirement of 35 U.S.C. 101. If USPTO personnel do not find such a

transformation or reduction, they must determine whether the claimed invention produces a useful, concrete, and tangible result.

Applicants submit that claims 30-41 are directed towards patentable subject matter because the claims (A) provide a transformation or reduction of an article to a different state or thing, and (B) produce a useful, concrete, and tangible result as provided under section 2106 of the MPEP.

More specifically, Applicants submit that "providing said user with calculated results" (independent claim 30) provides a transformation or reduction of an article to a different state or thing (i.e., "calculated results"), which is provided to the user in a useful, concrete, and tangible form. Additionally, Applicants submit that "outputting said codes to said user" (independent claim 36) provides a transformation or reduction of an article to a different state or thing (i.e., "codes"), which is provided to the user in a useful, concrete, and tangible form.

Section 2106 of the MPEP also provides that "a claim that recites a computer that *solely calculates* a mathematical formula (see Benson) or a computer disk that *solely stores* a mathematical formula is not directed to the type of subject matter eligible for patent protection" (emphasis added). Applicants submit that the "calculated results" and "codes" of the claimed invention are not "solely calculate[d]" or "solely store[d]". Instead, the "calculated results" and "codes" of the claimed invention are "provid[ed to] said user" (independent claim 30) and "outputting ... to said user" (independent claim 36), respectively, in a transformed, useful, concrete, and tangible form. In view of the

foregoing, the Examiner is respectfully requested to reconsider and withdraw these rejections.

III.   The Prior Art Rejections

Claims 16-22 and 30-41 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Zambo, et al. (U.S. Patent No. 6,985,907), hereinafter referred to as Zambo, in view of McCollum, et al. (U.S. Publication No. 2005/0091640), hereinafter referred to as McCollum, in further view of Applicant Admitted Prior Art, hereinafter referred to as AAPA. Applicants respectfully traverse these rejections based on the following discussion.

The claimed invention provides an automated method for interpreting codified provisions. As described in paragraph 0018 of Applicants' disclosure, FIG. 1 schematically represents a general system architecture 110 for interpreting codes. Code 130 is mapped to target rules 140, the output of which is provided as input to a rule evaluation engine 150. The rule evaluation engine 150 also has as inputs a user perspective 110, and a triggering event 120. The rule evaluation engine 150 provides as output applicable provisions 160 of the code 130.

In the rejection, the Office Action argues that McCollum discloses the claimed features of "evaluating said logic rules when one of said triggering events occur, wherein said evaluating of said logic rules comprises identifying codes matching said evaluation functions" (independent claims 16, 30, and 36). However, the "rules 104" of McCollum are not evaluated when one of said triggering events occur. Instead, McCollum discloses

evaluated a rule if the rule requires that a value be compared against a limit. Furthermore, McCollum does not disclose identifying the "machine code sequences" (which the Office Action asserts teaches the "codes" and "correct predetermined code" of the claimed invention) that match evaluation functions. Instead, McCollum merely discusses "classifiers" that can be employed to look for patterns and diagnose a system by looking for successful and unsuccessful patterns. Therefore, as explained in greater detail below, Applicants respectfully submit that the prior art of record does not teach or suggest the claimed invention.

Applicants traverse the rejections because the prior art of record does not teach or suggest the claimed features of "evaluating said logic rules when one of said triggering events occur, wherein said evaluating of said logic rules comprises identifying codes matching said evaluation functions". Such features are defined in independent claims 16, 30, and 36 using similar language. The Office Action argues that such features are disclosed in McCollum (Office Action, pp. 7-8, item 16). Applicants respectfully disagree.

First of all, Applicants submit that the "rules 104" of McCollum (which the Office Action asserts teaches the "logic rules" of the claimed invention) are not evaluated "when one of said triggering events occur" (independent claims 16, 30, and 36). Instead, McCollum discloses evaluating a rule if the rule requires that a value be compared against a limit (McCollum, para. 0003). Nevertheless, nothing within McCollum mentions evaluating the "rules 104" when a "triggering event" occurs.

Furthermore, the Office Action argues that McCollum discloses "associating triggering events with said codes" (Office Action, p. 7, item 16). In support for this contention, the Office Action references paragraph 0171 of McCollum, which discloses that if a condition occurs which triggers a specific polling operation, this is coded. However, the "specific polling operation" of McCollum does not evaluate the "rules 104". Therefore, it is Applicants' position that the "rules 104" of McCollum are not evaluated "when one of said triggering events occur" (independent claims 16, 30, and 36).

Secondly, Applicants submit that McCollum fails to teach or suggest "identifying codes matching said evaluation functions" (independent claims 16, 30, and 36). Referencing paragraph 0236 of McCollum, the Office Action asserts that such features are taught by the prior art (Office Action, p. 8, item 16).

Applicants respectfully disagree and submit that nothing within McCollum, including the portions cited by the Office Action, teaches identifying the "machine code sequences" (which the Office Action asserts teaches the "codes" and "correct predetermined code" of the claimed invention) that match evaluation functions. Instead, the cited portions of McCollum merely discuss "classifiers" that can be employed to look for patterns and diagnose a system by looking for successful and unsuccessful patterns. Nevertheless, such patterns do not identify the "machine code sequences" that match evaluation functions.

To the contrary, as described in paragraph 0006 of Applicants' disclosure, codes, such as legal or other codified provisions are represented as logical expressions in a

particular rules system. Conversion of the codified provisions to a suitable rules system can be achieved manually, or through suitable automation. The interests of different parties affected by or having an interest in the codified provisions is represented by logical conditions or evaluation expressions that relate to the party's utility. For events that relate to the codified provisions, such as possible or actual violations of the code, the rules are evaluated in view of the event, and each of the party's evaluation expressions.

As further described in paragraph 0018 of Applicants' disclosure, FIG. 1 schematically represents a general system architecture 110 for interpreting codes. Code 130 is mapped to target rules 140, the output of which is provided as input to a rule evaluation engine 150. The rule evaluation engine 150 also has as inputs a user perspective 110, and a triggering event 120. The rule evaluation engine 150 provides as output applicable provisions 160 of the code 130.

Accordingly, Applicants submit that the "rules 104" of McCollum are not evaluated when one of said triggering events occur. Instead, McCollum discloses evaluated a rule if the rule requires that a value be compared against a limit. Furthermore, McCollum does not disclose identifying the "machine code sequences" (which the Office Action asserts teaches the "codes" and "correct predetermined code" of the claimed invention) that match evaluation functions. Instead, McCollum merely discusses "classifiers" that can be employed to look for patterns and diagnose a system by looking for successful and unsuccessful patterns. Therefore, it is Applicants' position that the proposed combination of McCollum and Zambo does not teach or suggest the claimed features of "evaluating said logic rules when one of said triggering events occur,

wherein said evaluating of said logic rules comprises identifying codes matching said evaluation functions" (independent claims 16, 30, and 36).

In addition, Applicants traverse the rejections because the prior art of record does not teach or suggest the claimed features of "mapping codes to logic rules, wherein said codes comprise statements of conduct comprising at least one of laws, policy statements, contract provisions, agreements, regulations, rules of association, constitutions, codes of conduct" as defined in independent claim 16.

The Office Action argues that such features are disclosed in AAPA (Office Action, pp. 5-6, item 9). In support for this assertion, the Office Action references paragraph 0002 of Applicants' disclosure. A verbatim block copy of paragraph 0002 of Applicants' disclosure is provided as follows:

[0002] The term code, and codified provisions, is used herein to refer to any set of formalized statements of conduct of individuals or legal entities, such as corporations. Such codes may be laws, such as those of civil or criminal justice, international laws, policy statements, contract provisions, agreements, regulations, rules of association, constitutions, codes of conduct, and so on.

Nevertheless, nothing within AAPA, including paragraph 0002 of Applicants' disclosure, discloses the claimed feature of "mapping [such] codes to logic rules" as defined by independent claim 16. In other words, although the Office Action asserts that paragraph 0002 of Applicants' disclosure discusses codes, nothing within AAPA discloses mapping such codes to logic rules. Therefore, it is Applicants' position that the prior art of record

does not teach or suggest the claimed features of "mapping codes to logic rules" as defined in independent claim 16.

Therefore, it is Applicants' position that the prior art of record does not teach or suggest many features defined by independent claims 16, 30, 36 and that such claims are patentable over the prior art of record. Further, it is Applicants' position that dependent claims 17-22, 31-35, and 37-41 are similarly patentable, not only because of their dependency from a patentable independent claims, but also because of the additional features of the invention they defined. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw the rejections.

IV. Formal Matters and Conclusion

In view of the foregoing, Applicants submit that claims 16-22 and 30-41, all the claims presently pending in the application, are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary. Please charge any

deficiencies and credit any overpayments to Attorney's Deposit Account Number 09-
0441.

<div style="text-align: center;">Respectfully submitted,</div>

Dated: October 31, 2007

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